

Before the
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SEP 03 2012

In the Matter of)
)
Distribution of 2010)
Cable Royalty Funds)
)

Docket No. 2012-4 CRB CD 2010

Copyright Royalty Board

**INDEPENDENT PRODUCERS GROUP'S
COMMENTS TO PARTIAL DISTRIBUTION OF FUNDS**

Worldwide Subsidy Group LLC (a Texas limited liability company) dba
Independent Producers Group ("IPG"), pursuant to the Notice Requesting Comments to
Partial Distribution of 2010 Funds, published August 3, 2012 by the Library of Congress,
77 Fed. Reg. 46527, hereby notifies the Copyright Office as follows:

IPG maintains no objection to the proposed distribution of 2010 cable royalty
funds.

IPG is not a participant in the Phase I proceedings.

IPG maintains Phase II claims in the syndicated programming, sports
programming, devotional programming and Canadian claimant categories, typically as an
assignee of rights. IPG asserts that a controversy exists with respect to the 2010 cable
royalty funds in Phase II of the syndicated programming, sports programming, devotional
programming and Canadian claimant categories with regard to programming initially

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owned or controlled by those parties whom have assigned rights to IPG. However, IPG is not currently in a position to ascertain the value of its claims in these categories.

Respectfully submitted,

Dated: August 31, 2012

_____/s/
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